

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,) 8:18CR313
)
Plaintiff,)
) MOTION FOR
vs.) REVIEW OF
) DETENTION
DAVID GAMSO,)
)
Defendant.)

COMES NOW Defendant, DAVID GAMSO, by and through his attorney, Brent M. Bloom, and hereby informs the Court that circumstances have materially changed since the time of the Court's initial order of detention on May 28, 2019 and based upon said changed circumstances, the information stated herein, and pursuant to 18 USC §3142, Defendant moves this Honorable Court for a hearing to address Mr. Gamso's release status, and to grant conditions of release only to allow Mr. Gamso to participate in inpatient chemical dependency treatment as detailed herein.

Defendant moves for a hearing to determine whether he should be granted conditions of release so that on June 27, 2019 at 9:30 a.m. he may enter inpatient treatment at CHI Health St. Francis Alcohol and Drug Treatment Center in Grand Island, NE.

Defendant informs the Court in the following particulars:

1. That Defendant has had a substance abuse evaluation by Trisha Troia, LCSW, a Licensed Alcohol and Chemical Dependency Counselor in Nebraska;
2. That said evaluation was provided to relevant staff at CHI Health St. Francis Alcohol and Drug Treatment Center in Grand Island, NE, ;
3. That CHI Health St. Francis Alcohol and Drug Treatment Center in Grand Island, NE, has informed counsel that Mr. Gamso has been accepted into inpatient treatment at said facility with an admission date and time of June 27, 2019 at 9:30 a.m.;

4. That both the evaluation from Trisha Troia and the acceptance letter from CHI Health St. Francis Alcohol and Drug Treatment Center in Grand Island, NE, have been provided to Quintin Erdman at U.S. Pretrial/Probation;
5. That being in inpatient treatment would mitigate any risk of flight or danger concerns that may have existed in this matter;
6. That Defendant's mother, Shari L. Keen has agreed to provide transportation to Defendant on June 27, 2019 from Douglas County Corrections to the CHI Health St. Francis Alcohol and Drug Treatment Center in Grand Island, NE, and is capable of doing so;
- 7.

WHEREFORE, Defendant, DAVID GAMSO, hereby moves pursuant to 18 USC §3142 for a hearing on this motion, for an order of the Court granting conditions of release to include Mr. Gamso's placement at CHI Health St. Francis Alcohol and Drug Treatment Center in Grand Island, NE beginning at 9:30 a.m. on June 27, 2019, and that Mr. Gamso be released from custody by 6:30 a.m. on June 27, 2019 so that he can be transported by his mother, Shari L. Keen from Omaha, NE to Grand Island, NE in time to be accepted into the facility at 9:30 a.m. on June 27, 2019

RESPECTFULLY submitted this 12th day of June, 2019.

DAVID GAMSO,
Defendant

BY: /s/ Brent M. Bloom, #18239
416 South 14th Street
Omaha, Nebraska 68102
(402) 342-2833
Attorney for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was filed on June 12, 2019 electronically with the United States District Court for the District of Nebraska through ECF and that the system generated electronic notification to:

Kim Bunjer, Assistant United States Attorney
/s/ Brent M. Bloom